

REMARKS

Claims 1-16 were examined, claims 1-13 are rejected, and claims 14-16 are objected to. Claims 17-27 have been previously withdrawn. Applicants amend claim 1. Applicants respectfully request reconsideration of pending claims 1-13, as amended, in view of at least the following remarks.

I. Claims Rejected Under 35 U.S.C. §102

The Patent Office rejects claim 1 under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 4,139,727 issued to Kuballa, et al. ("Kuballa"). In order to anticipate a claim, the relied upon reference must disclose every limitation of the claim.

Claim 1 is not anticipated by Kuballa, because Kuballa does not describe a plurality of cables each comprising a conductor, each cable extending through respective ones of the plurality of through holes of a substrate and terminating about a surface of the substrate and available for electrical contact to a second substrate. Kuballa describes cable wires 1 held by clamping components 2 and 3 for disposing the ends of wires through contact holes in circuit board 17 so that the ends of the cable wires can be soldered to the leads on the circuit board. (Kuballa, col. 2, line 66 through col. 3, line 5.) Figures 3, 4, and 6 of Kuballa show ends 10 of cable wires 1 extending through circuit board 17 and past the surface of circuit board 17 so that ends 10 can be soldered to leads on the surface of circuit board 17. If circuit board 17 is identified as the first substrate through which the wires extend (the Patent Office position), since the ends of the wires are soldered to leads on circuit board 17, the wires are not available for contact to a second different substrate. Also, if clamping components 2 and 3 are characterized as the first substrate, the wires do not terminate about a surface of the clamping components, since the wires have an additional length to extend through circuit board 17 and connect to leads on the circuit board.

Applicants respectfully request the Patent Office withdraw the rejection identified above for claim 1.

Next, the Patent Office rejects claims 1-7 and 10-13 under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,152,744 issued to Maeda ("Maeda"). Again, in order to anticipate a claim, the relied upon reference must disclose every limitation of the claim.

Applicants respectfully disagree with the rejection of independent claim 1 and submit that independent claim 1 is allowable for at least the reason that Maeda does not describe "a plurality of cables each comprising a conductor, each cable extending through respective ones of the plurality of through holes of the first substrate and terminating about a surface of the first substrate," as required by claim 1. In Figure 7, Maeda shows cable 29 extending less than through substrate 1, with conductor 30 extending beyond a surface of substrate 1.

Applicants submit that dependent claims 2-7 and 10-13 are dependent upon allowable base claim 1, and are therefore not anticipated by Maeda for at least the reason explained above. Applicants respectfully request that the Patent Office withdraw the rejection of claims 2-7 and 10-13 as being anticipated by Maeda.

II. 35 U.S.C. §103(a): Rejection of Claims 8-9

The Patent Office rejects claims 8-9 under 35 U.S.C. §103 over Maeda in view of U.S. Patent No. 6,233,818 issued to Finn et al. (Finn). Finn is cited for coating a contact. The Patent Office believes motivation can be found to coat the conductors of Maeda (conductors 30 and 34) to reduce oxidation.

Claims 8-9 depend from claim 1 and therefore contain all the limitations of that claim. Claims 8-9 are prima facie not obvious over the cited references because the references do not disclose cables extending through a substrate.

Applicants also question the motivation to combine Finn with Maeda. Conductors 30 and 34 are soldered to contact film 31. Thus, the structure of substrate 1 and cables 29 is a partial or transient structure with the soldering to contact film 31 and flexible circuit 6 further components of the overall (permanent) structure. Maeda does not indicate a need such as Finn to connect dissimilar metals. Maeda does not describe the material for conductors 30 and 34 or on contact film 31.

For the above stated reasons, Applicants respectfully request that the Patent Office withdraw the rejection to claims 8-9 under 35 U.S.C. §103(a) over Maeda in view of Finn.

III. Allowable Subject Matter

Applicants note with appreciation that the Patent Office has indicated that claims 14-16 are objected to as being dependent upon rejected base claim but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely claims 1-16, are patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207 3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date:

8/25/04

William T. Babbitt

William Thomas Babbitt, Reg. No. 39,591

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025
(310) 207-3800

I hereby certify that this correspondence is being transmitted by facsimile on the date shown below to United States Patent and Trademark Office.

Nedy Calderon

Nedy Calderon

8/25/04

Date